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October 26, 2018

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
Title V Program
P.O. Box 4312
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**SUBJECT: Annual Monitoring Report under 40 CFR 60, Subpart OOOOa
Texas Gas Transmission, LLC - Bosco Compressor Station
Agency Interest Number 193194
Permit Number 2160-00175-00**

To Whom It May Concern:

Texas Gas Transmission, LLC (Texas Gas) is submitting this annual report for its Bosco Compressor Station, located in Ouachita Parish, as required by 40 CFR 60.5420a(b). The facility is located at 4065 Highway 165 South, Monroe, Louisiana 71202. This report covers the period from August 3, 2017 through August 2, 2018. Pursuant to 60.5420a(b), the report is due by October 31 and is therefore timely.

Construction of this station began after September 18, 2015; therefore, the facility is subject to the leak detection and repair (LDAR) provisions found in 40 CFR 60.5397a. The affected facility covered by this report is the collection of fugitive emission components at the compressor station. Pursuant to 40 CFR 60.5397a(f)(2), the initial LDAR survey for this facility would have been due by June 3, 2017.

US EPA informed the American Petroleum Institute (API) and other petitioners on April 18, 2017 that certain provisions from 40 CFR 60, Subpart OOOOa were formally being reconsidered by EPA. The LDAR provisions for natural gas compressor stations are part of the reconsideration proceedings. A 90-day Stay of Enforcement for the LDAR provisions was published in the *Federal Register* on June 5, 2017 (82 FR 25730), with an effective date of June 2, 2017. A second 90-day Stay of Enforcement, which would have taken effect when the first 90-day Stay concluded, was published in the *Federal Register* on June 16, 2017 (82 FR 27641). EPA also proposed a two-year Stay of Enforcement of the LDAR provisions on June 16, 2017 (82 FR 27645).

On July 3, 2017, the U.S. Court of Appeals for the D.C. Circuit vacated EPA's first 90-day Stay of Enforcement. Per the EPA website:

EPA is considering its options in light of the court's opinion. On July 7, 2017, EPA moved the court to recall its mandate in order to provide EPA with the standard short period of time in which to evaluate its options before the court's decision becomes effective. This motion is pending before the court. The court also emphasized that nothing in its opinion limits EPA's authority to reconsider the oil and gas standards and to proceed with its June 16, 2017 proposed stays of certain requirements in this rule. EPA will take comment on those proposals until August 9, 2017.

As a result of the pending reconsideration proceedings and the first Stay-of-Enforcement, Texas Gas did not conduct the initial LDAR survey for this facility until October 3, 2017. Quarterly LDAR surveys have been subsequently conducted in accordance with 40 CFR 60.5397a(g)(2) and the results of those surveys are reflected in Tables 1 and 2. A survey was conducted during the third quarter of this year; however, that occurred after this reporting period. The results of that survey will be submitted in the next annual report required under Subpart OOOOa.

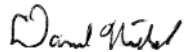
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The reporting requirements of 40 CFR 60.5420a(b)(7) are all met with this submittal (including attachments). Tables 1 and 2 provide many of the details in conjunction with the information provided in this letter. There are no components at this facility classified as difficult-to-monitor or unsafe-to-monitor; therefore, no monitoring of such components occurred during the reporting period. This statement satisfies 60.5420a(b)(7)(ix).

Our intent was to file this annual report in US EPA's CEDRI system pursuant to 40 CFR 60.5420a(b)(11). However, according to information posted on the CEDRI site and conversations with US EPA personnel, the CEDRI template is not final at this time and the reporting portal for Subpart OOOOa is therefore not open. The portal likely will not reopen until the current rule reconsideration process has been completed. US EPA instructed us to file the report as we would other compliance reports until such time as the CEDRI template is finalized and the reporting portal is opened.

Texas Gas is committed to maintaining its operations in compliance with all state and federal regulations. To the best of our knowledge, there have been no deviations from the requirements of 40 CFR 60, Subpart OOOOa at this facility during the reporting period. Please contact me at david.nickel@bwpmlp.com or (903) 753-7209 (extension 2926) if you have questions or need additional information.

Sincerely,



David Nickel
Environmental Specialist

Attachments

cc: Bosco Station (Air Files)

US EPA, Region VI (Submitted electronically to R6WellCompletion@epa.gov)

Table 1
Summary of LDAR Monitoring Surveys

Company Name: Texas Gas Transmission, LLC

Facility Name: Bosco Station

Reporting Period: August 3, 2017 through August 2, 2018

Reporting Requirement Citation; 40 CFR 60.5420a(b)(7)

(i)	(ii)	(ii)	(iii)	(iii)	(iv)	(iv)	(iv)	(v)	(vi)
Survey Date	Beginning Time	Ending Time	Name of Camera Operator	Training and Experience	Ambient Temperature (F)	Sky Conditions	Max Wind Speed (mph)	Monitoring Instrument Used	Any Deviations from Monitoring Plan? If so, describe
10/3/2017	7:30 AM	9:45 AM	CR Thompson	Trained thermographer with 7 years of experience operating OGI camera	71	Sunny	5	FLIR Model 320 Optical Gas Imaging Camera	No
3/21/2018	2:00 PM	3:00 PM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	65	Sunny	15	FLIR Model 320 Optical Gas Imaging Camera	No
5/31/2018	7:30 AM	8:30 AM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	77	Sunny	5	FLIR Model 320 Optical Gas Imaging Camera	No

Table 2
Summary of Leak and Repair Data

Company Name: Texas Gas Transmission, LLC

Facility Name: Bosco Station

Reporting Period: August 3, 2017 through August 2, 2018

Reporting Requirement Citation; 40 CFR 60.5420a(b)(7)

		(vii)	(x)	(viii)	(xi)	(xi)	(xii)
Leak #	Date Discovered	Component Type	Successful Repair Date	Repaired As Required in 60.5397a(h)?	Was Delay of Repair Necessary?	Explanation for Delay of Repair (if necessary)	Repair Verification Method
1	10/3/2017	Connector	10/31/2017	Yes	No	-	Soap Bubbles
2	10/3/2017	Meter	10/4/2017	Yes	No	-	Soap Bubbles
3	10/3/2017	Connector	10/31/2017	Yes	No	-	Soap Bubbles
4	10/3/2017	Connector	10/3/2017	Yes	No	-	OGI
5	10/3/2017	Connector	11/1/2017	Yes	No	-	Soap Bubbles
6	3/21/2018	Connector	3/21/2018	Yes	No	-	OGI
7	3/21/2018	Connector	3/29/2018	Yes	No	-	Soap Bubbles
2Q18 survey conducted on 5/31/18. No leaks were found.							

	(vii)	(vii)	(viii)	(xi)	(xi)
Survey Date	Component Type	Leaking Components Detected	Not Repaired As Required in 60.5397a(h)	Placed on Delay of Repair	Explanation for Delay of Repair (if necessary)
10/3/2017	Connector	4	0	0	-
10/3/2017	Meter	1	0	0	-
3/21/2018	Connector	2	0	0	-
5/31/2018	None Found Leaking		0	0	-

40 CFR 60, Subpart OOOOa Annual Report Certification Statement

I, the undersigned, qualify as a certifying official pursuant to 40 CFR 60.5430a and hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document and its attachments are true, accurate and complete.



Dave Perkins

Vice President – Environmental, Safety, and Security

Date: October 26, 2018